

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

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	)	Case no: 8:10-2940-HFF
<b>Mindy Cockrell, on behalf of herself and others similarly situated,</b>	)	<b>FAIR LABOR STANDARDS ACT</b>
	)	<b>Collective Action</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>COMPLAINT</b>
	)	
<b>National Wild Turkey Federation, Inc.,</b>	)	<b>Jury Trial Requested</b>
	)	
<b>Defendant.</b>	)	

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Plaintiff would respectfully show unto the Court as follows:

1. This action is brought by Plaintiff individually and as a collective action for unpaid overtime, liquidated damages, interests, costs, attorney fees, and all other relief provided for under the Fair Labor Standards Act (“FLSA”).
2. Plaintiff is a resident of Edgefield County, South Carolina. Defendants employed Plaintiff as an Administrative Assistant in Edgefield County, South Carolina.
3. Plaintiff worked hours in excess of 40 in a workweek but was never paid an overtime rate of not less than one and one-half times her regular rate of pay, in violation of Section 7(a) of the FLSA.
4. Defendant had full knowledge that Plaintiff was working in excess of 40 hours in a workweek without appropriate compensation therefore. As a result of the Defendant’s willful violations of the FLSA, Plaintiff is entitled to all damages and other relief available under that statute.

5. Plaintiff commences this action on behalf of herself and all others who have worked in excess of forty hours (40) per work week, but who have not been paid overtime in accordance with the FLSA.
6. Plaintiff consents to this action and to being a plaintiff.

WHEREFORE, Plaintiff respectfully requests, on behalf of herself and those opting to join this action, a trial by jury on her claim for violation of the Fair Labor Standards Act as well as entry of judgment in an amount to be determined at trial to include all unpaid overtime wages, liquidated damages, attorneys fees and pre-judgment interest, and any other relief provided for under the Act.

Respectfully submitted this 12<sup>th</sup> day of November, 2010.

s/ Brian P. Murphy

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